

UNITED STATES BANKRUPTCY COURT

District of Massachusetts

In Re Brian C. Sheehy *

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Case Number 11-11233FJB

MOTION TO POSTPONE HEARING ON MOTION FOR RELIEF FROM STAY
PENDING DETERMINATION OF TRUSTEE'S MOTION TO DISMISS FOR
ABUSE UNDER SECTION 707(B)(1) AND (2)(A)

And

Request for Expedited Action on Motion

1. Moving party/creditor OPEIU Local 600 hereby respectfully moves that the hearing on the Motion For Relief From Stay scheduled for Wednesday, June 8, 2011, be postponed pending the Court's determination of the Trustee's pending Motion To Dismiss For Abuse under Section 707(B)(1) and (2)(A).
2. Moving Party represents to the Court that Gary Cruickshank, counsel for the Debtor and Adam Ruttenberg, Counsel for the Chapter 7 Trustee have assented to this Motion to Postpone.
3. Moving Party contacted counsel for the Assistant U.S.Trustee, Eric K. Bradford, but was unable to reach him prior to filing this Motion.

4. Moving Party respectfully submits that postponing argument on the Motion To Relief is in the Court's and the parties' best interest because disposition of the Trustee's Motion To Dismiss could render the Motion for Relief from Stay moot.
5. This matter was set down for hearing by the Court with notice to the Moving party on June 3 and the hearing is scheduled for tomorrow, requiring this Court's taking action in an expedited fashion to avoid the need for counsel to appear in Court tomorrow.

Respectfully Submitted,

OPEIU Local 600

By Its Attorney,

/s/Howard B. Lenow
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